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Attorney for Defendant  
HEATHER ROMOSER

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, ) No. 2:21-CR-00110 DAD  
Plaintiff, )  
v. ) **STIPULATION AND ORDER FOR  
MODIFICATION OF CONDITIONS OF  
PRETRIAL RELEASE**  
Heather Romoser, )  
Defendant. )  
)

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Defendant, HEATHER ROMOSER, by and through her counsel of record, TONI  
WHITE, and the GOVERNMENT hereby stipulate as follows:

1. On January 26, 2022, Ms. Romoser was ordered released on bond with special  
conditions including a 90 day residential drug treatment program at Wellspace  
Residential Drug Treatment program. (ECF DOC #79).
2. Special condition numbers 16, 17 and 18 of Ms. Romoser's special conditions of  
release (ECF DOC #80) subjected Ms. Romoser to location monitoring upon her  
release from Wellspace.
3. Ms. Romoser is being supervised in Idaho by Pretrial Services. Both her pretrial  
officer in Idaho, Joel Osborne, and Sacramento, Darryl Walker, are amenable to the  
removal of Ms. Romoser's location monitoring.

1           4. Pretrial services officer Osborne reports as follows:

2           She [Ms. Romoser] has been in full compliance since her placement on pretrial  
3 supervision approximately six months ago. She abides by her curfew, in fact, she is  
4 usually home several hours before her curfew. Most of the time she is home with her  
5 parents when she is not at work. She is employed full-time and is enrolled in  
6 treatment. According to her counselor, she is consistent with attendance and is  
7 engaged. She has consistently attended drug testing without submitting any positive  
8 tests.

9           We like to prioritize location monitoring technology and utilize it for individuals who  
10 present significant risk factors, as location monitoring cases are very time consuming  
11 for the officer. Currently, she is not exhibiting any risk factors, such as criminal  
12 activity, drug use, or flight. It's not necessarily interfering with anything in her life,  
13 other than it's expensive and uncomfortable. Yes, in a way it is a reward for her  
14 compliance, but I believe the potential removal of the device has given her incentive  
15 to do well.

16           5. Aaron Pennekamp, counsel for the Government, has been advised of the proposed  
17 removal of location monitoring and has no objection.

18           By this stipulation, Ms. Romoser now moves to have special conditions #16, 17 and 18  
19 removed.

20           IT IS SO STIPULATED.

21           Dated: December 6, 2022

22           McGregor Scott  
23           United States Attorney

24           By: /s/ Aaron Pennekamp  
25           Aaron Pennekamp  
26           Assistant U.S. Attorney

27           For the United States

28           Dated: December 6, 2022

29           By: /s/ Toni White  
30           TONI WHITE

31           For Defendant Heather Romoser

1                           **O R D E R**

2                           IT IS SO FOUND AND ORDERED

3                           Dated: December 9, 2022



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5                           CAROLYN K. DELANEY  
6                           UNITED STATES MAGISTRATE JUDGE  
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